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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

| | | |
|----------------------|---|-----------------|
| In Re: | § | |
| John Manuel Montez | § | Case No. |
| Sharen Louise Montez | § | 09-70584-HDH-13 |
| Debtors | § | Chapter 13 |

DEBTORS' MOTION TO EXTEND AUTOMATIC STAY

Comes Now Debtors, by counsel, and for this Motion state as follows:

1. Debtors filed for relief under Chapter 13 in the Northern District of Texas. This is a core proceeding. Debtors were debtors in a prior case during the preceding year. To-wit: Chapter 13, Case No. 08-70322-HDH-13 filed on 8/7/2008.
2. Debtors seek an extension of the automatic stay imposed for 30-days pursuant to 11 U.S.C. §362(c)(3)(A), as to all creditors until further order or discharge to effectuate an orderly reorganization, pursuant to 11 U.S.C. §362(c)(3)(B).
4. Debtors' prior case was dismissed for: Debtor stopped working as an independent driver in March of 2009. He was out of work until July 10, 2009. Joint Debtor worked as a substitute teacher, working as needed.
5. The following changes of circumstances demonstrate that the Debtors can perform this plan and are likely to complete the case successfully: Debtor's now employed as a truck driver, full time for Conway Freight and will have the Trustee payment deducted from his pay check weekly. Joint Debtor is currently working part time for McDonald's.

WHEREFORE, Debtors' request this Court enter its order continuing the automatic stay under §362(a) in this proceeding as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2) or a motion for relief is granted under §362(d).

Respectfully submitted,

/s/Monte J. White
Attorney for Debtors

CERTIFICATE OF SERVICE

A true and exact copy of the foregoing Motion and Notice of Hearing was served electronically by the ECF System or by First Class Mail on November 19, 2009 on all parties on the mailing matrix:

/s/Monte J. White
Attorney for Debtors

Attorney General of Texas
Shelly Horton
4630 50th Street, Suite 300
Lubbock, TX 79414

JC Penney
Attention: Bankruptcy Department
PO Box 103106
Roswell, GA 30076

Titanium Emergency Group
P.O. Box 3407
Emergency room Physician
Wichita Falls, Texas 76301

Capital One Bank
PO Box 85520
Richmond, VA 23285

Maverick Finance
PO Drawer 811
Spartanburg, SC 29304

Triad Financial Corporation
5201 Rufe Snow Ste 400
North Richland Hills, TX 76180

Curtis O. Barnes, PC/Bestbuy
PO Box 1390
Anaheim, CA 92815-1390

Medi Comm Services/NTS Communic.
5139 69th St
Lubbock, TX 79424

Tribute
PO Box 105555
Atlanta, GA 30348

Datasearch/United Regional
PO Box 461289
San Antonio TX 78246-1289

Midland Credit Mgmt/Household
8875 Aero Dr Ste 200
San Diego, CA 92123

TXU Energy
200 W John Carpenter Fwy
Irving, TX 75039

Executive Services
1200 Austin St
Wichita Falls, TX 76301

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Verizon Wireless
PO Box 3397
Bloomington, IL 61702

Executive Services/Titanium Eme:
1200 Austin St
Wichita Falls, TX 76301

Portfolio Recoveries/The Credit
Attention: Bankruptcy Department
PO Box 12914
Norfolk, VA 23541

Verizon Wireless
PO Box 105378
Atlanta, GA 30348

Hsbc Bank
Po Box 5253
Carol Stream, IL 60197

Powerhouse Gym
3127 Lawrence Rd
Wichita Falls, TX 7630

Wichita Co, City of Burk,Burkbu:
c/o Harold Lerew
PO Box 8188
Wichita Falls, TX 76307-8188

HSBC/Bestbuy
Po Box 15519
Wilmington, DE 19850

Sallie Mae Servicing
1002 Arthur Dr
Lynn Haven, FL 32444

Wichita Furniture
1000 Indiana St
Wichita Falls, TX 76301

HSBC/ORCHARD BK
ATTN: BANKRUPTCY
PO BOX 5253
Carol Stream, IL 60197

Target National Bank
PO Box 9475
Minneapolis, MN 55459

Wilshire Credit Corp
PO Box 8517
Portland, OR 97207-8517

IRS Special Procedures
1100 Commerce St., Room 951
Mail Stop 5029 DAL
Dallas, TX 75246

The Cash Store
3900 Sheppard Access Rd
Wichita Falls, TX 76308

Wilshire Credit Corp
PO Box 1650
Portland, OR 97207-1650

World Finance Corp
928 Indiana St
Wichita Falls, TX 76301

Zales/Citibank
Po Box 6497
Sioux Falls, SD 57117